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Counsel for Plaintiff

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

MDL No. 1917

Case No. 07-cv-5944 JST

This Document Relates To:

*Government of Puerto Rico v. Panasonic
Corporation of North America, et al, Orig C.A
No. 3:19-01246*

**DECLARATION OF JOHN A.
GIRARDI IN SUPPORT OF
GOVERNMENT OF PUERTO
RICO'S REPLY MOTION TO SERVE
FOREIGN DEFENDANTS THROUGH
THEIR UNITED STATES-BASED
COUNSEL UNDER FEDERAL RULE
CIVIL PROCEDURE 4(F)(3)**

Courtroom: 9, 19th Floor
Judge: Honorable Jon S. Tigar

DECLARATION OF JOHN A. GIRARDI

I, JOHN A. GIRARDI, declare as follows:

1. I am an attorney at the law firm of Girardi | Keese and one of the attorneys of record herein for PLAINTIFF GOVERNMENT OF PUERTO RICO in the above-captioned matter. Unless otherwise indicated, I have personal knowledge of the matters stated in this declaration, and if called as a witness, I could and would testify competently thereto. I make this declaration in support of GOVERNMENT OF PUERTO RICO'S REPLY TO DEFENDANTS' OPPOSITION TO SERVE FOREIGN DEFENDANTS THROUGH THEIR UNITED STATES-BASED COUNSEL UNDER FRCP4(F)(3).

2. Attached hereto as Exhibit 1 is a true and correct copy of the table which identifies the Defendants in the instant action, the location of the principal offices, Defendants respective counsel who first appeared in the action, and date of service. The highlighted Defendants are those who objected to accept service.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this Declaration was executed on this 31st day of July, 2020 in Los Angeles, California.

/s/ John A. Girardi
JOHN A. GIRARDI

EXHIBIT 1

<u>Defendants</u>	<u>Date of Service</u>	<u>Principally Located</u>	<u>Law Firm to First Appear for Defendant</u>	<u>Date First Law Firm Appeared for Defendant</u>
<u>Chunghwa Defendants</u>				
Chunghwa Picture Tubes (Malaysia) Sdn. Bhd.		Malaysia	Gibson Dunn & Crutcher LLP	8/20/2010
Chunghwa Pictures Tubes, Ltd.		Taiwan	Gibson Dunn & Crutcher LLP	8/20/2010
<u>Hitachi Defendants</u>				
Hitachi America, Ltd.	2/14/2019	USA	Morgan Lewis & Bockius LLP	4/17/2008
Shenzhen Seg Hitachi Color Display Devices, Ltd.		China		
Hitachi, Ltd.		Japan	Morgan Lewis & Bockius LLP	4/17/2008
Hitachi Displays, Ltd.		Japan	Morgan Lewis & Bockius LLP	4/17/2008
Hitachi Asia, Ltd.		Singapore	Morgan Lewis & Bockius LLP	4/17/2008
Hitachi Electronics Devices (USA), Inc.		USA	Morgan Lewis & Bockius LLP	4/17/2008
<u>IRICO Defendants</u>				
IRICO Group Corp.		China	Pillsbury Winthrop Shaw Pittman LLP	6/24/2008
IRICO Group Electronics, Ltd.		China	Pillsbury Winthrop Shaw Pittman LLP	6/24/2008
<u>LG Electronics Defendants</u>				
LG Electronics USA, Inc.	2/14/2019	USA	Sidley Austin LLP	3/21/2008
LG Electronics, Inc.		South Korea	Sidley Austin LLP	3/21/2008
LG Electronics Taiwan Taipei Co., Ltd.		Taiwan	Sidley Austin LLP	3/21/2008
<u>Panasonic Defendants</u>				
Panasonic Corp. of North America	2/14/2019	USA	Weil, Gotshall & Manges LLP and Dewey & Leboeuf LLP	3/5/2008
Beijing-Matsushita Color CRT Co., Ltd.		China	Freshfields Bruckhaus Deringer US LLP	7/16/2008
MT Picture Display Co., Ltd.		Japan	Weil, Gotshall & Manges LLP and Dewey & Leboeuf LLP	6/4/2008
Panasonic Corp.		Japan	Weil, Gotshall & Manges LLP and Dewey & Leboeuf LLP	10/14/2008
Matsushita Electronic Corp. (Malaysia) Sdn. Bhd.		Malaysia	Dewey & Leboeuf LLP	7/28/2008
<u>Philips Electronics Defendants</u>				
Philips Electronics North America Corp.	2/24/2019	USA	Howrey LLP	3/21/2008
Philips Da Amazonia Industria Electronica, Ltda.		Brazil	Howrey LLP	
LG PHILIPS DISPLAYS, LTD.		Hong Kong	Munger Tolles & Olson LLP	
LP Displays International, Ltd.		Hong Kong	Cleary Gottlieb Steen & Hamilton LLP	4/1/2008
Koninklijke Philips Electronics, N.V.	5/16/2019	Netherlands	Howrey LLP	8/15/2018 (Counsel filed Opposition on behalf of Defendant)
Philips Electronics Indus. Taiwan, Ltd.		Taiwan	Howrey LLP	5/18/2009
<u>Samsung Electronics Defendants</u>				
Samsung Electronics America, Inc.	2/14/2019	USA	O'Melveny & Meyers LLP	5/13/2009
Samsung SDI Brasil Ltda.		Brazil	Sheppard, Mullin, Richter & Hampton LLP	12/18/2007
Shenzhen Samsung SDI Co., Ltd.		China	Sheppard, Mullin, Richter & Hampton LLP	12/18/2007
Tianjin Samsung SDI Co., Ltd.		China	Sheppard, Mullin, Richter & Hampton LLP	12/18/2007
Samsung SDI (Malaysia) Sdn. Bhd.		Malaysia	Sheppard, Mullin, Richter & Hampton LLP	12/18/2007
Samsung SDI Mexico S.A. de C.V.	3/5/2019	Mexico	Sheppard, Mullin, Richter & Hampton LLP	12/18/2007

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Samsung Electronics Co., Ltd.		South Korea	O'Melveny & Meyers LLP	5/13/2009
Samsung SDI Co., Ltd. a/k/a Samsung Display Device Co., Ltd.		South Korea	Sheppard, Mullin, Richter & Hampton LLP	12/18/2007
Samsung SDI America, Inc.		USA	Sheppard, Mullin, Richter & Hampton LLP	12/18/2007
<u>Samtel Defendant</u>				
Samtel Color, Ltd.		India	McDermott Will & Emery LLP	5/18/2009
<u>Tatung Defendant</u>				
Tatung Co. of America, Inc.	2/14/2019	USA	Baker & McKenzie LLP	4/3/2008
<u>Thai CRT Defendant</u>				
Thai CRT Co., Ltd.		Thailand		
<u>Toshiba Defendants</u>				
Toshiba America Electronics Components, Inc.	2/14/2019	USA	White & Case LLP	5/8/2008
P.T. Tosummit Electronic Devices Indonesia		Indonesia		
Toshiba Corp.		Japan	White & Case LLP	5/8/2008
Toshiba Display Devices (Thailand) Co., Ltd.		Thailand		
Toshiba America, Inc.		USA	White & Case LLP	5/8/2008
Toshiba America Consumer Products, LLC.		USA	White & Case LLP	5/8/2008
Toshiba America Info. Systems, Inc.		USA	White & Case LLP	5/8/2008